

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

JACKIE EASTMAN,)	
)	
Plaintiff,)	
)	
v.)	Case No.
)	
AVIS BUDGET CAR RENTAL, LLC,)	
)	
Defendant.)	

DEFENDANT'S NOTICE OF REMOVAL

1. A civil action has been commenced and is now pending in the Circuit Court of Saint Louis County, State of Missouri, Cause No. 22SL-CC04686, wherein Jackie Eastman is the Plaintiff and Avis Budget Car Rental, LLC is a Defendant.

2. This action is a civil action wherein Plaintiff has made claims for damages as a result of Defendant's alleged negligence in connection with a slip and fall accident that occurred on September 27, 2019.

3. Defendant Avis Budget Car Rental, LLC is a Delaware for-profit limited liability company with its principal place of business in Parsippany, New Jersey.

DIVERSITY OF CITIZENSHIP EXISTS

4. This action is a civil action, of which the United States District Courts have original jurisdiction pursuant to 28 U.S.C. § 1332 and is one which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441, and this is a civil action proceeding involving diversity of citizenship.

7. Plaintiff Jackie Eastman is citizen of Alabama.

8. Defendant Avis Budget Car Rental, LLC is a Delaware for-profit limited liability company corporation with its principal place of business in Parsippany, New Jersey.

THE AMOUNT IN CONTROVERSY HAS BEEN SATISFIED

9. The amount in controversy exceeds \$75,000.00 for Plaintiff exclusive of interest and costs. Because this is a personal injury action where Plaintiff claims damages for alleged “severe” and “catastrophic” personal injuries, past and future medical expenses, damages for emotional distress, and past and future pain and suffering, and Plaintiff has provided Defendant to date with medical bills allegedly incurred from the accident totaling \$78,239.78, Defendant believes the amount in controversy shall exceed the minimum jurisdictional amount. Specifically, Plaintiff alleges that she suffered two hip fractures, a shoulder injury, back injury, neck injury, foot pain, and bruising.

NOTICE OF REMOVAL IS TIMELY

10. Less than thirty (30) days have elapsed since receipt of said initial pleading by Defendant Avis Budget Car Rental, LLC.

11. Defendant files herewith a copy of all process, pleadings, and orders it has in this action. *See Exhibit A.*

WHEREFORE Defendant Avis Budget Car Rental, LLC prays the Court to accept its Notice for Removal and make and enter such orders as may be necessary for the complete removal of this action from the Circuit Court of Saint Louis County, State of Missouri to the United States District Court for the Eastern District of Missouri, and that further proceedings be discontinued in the State Court and all future proceedings be held in this Court, as the laws in such case provide.

Respectfully submitted,

ROBERTS PERRYMAN, P.C.

/s/ Ted L. Perryman

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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been filed upon the court's electronic filing system this 2nd day of December, 2022 to:

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